

Facility Name: **Geiger Brickel - Atlanta Facility**
 City: Atlanta
 County: Fulton
 AIRS #: 04-13-121-00558

Application #: TV- 9314
 Date Application Received: November 1, 1996
 Date Application Deemed
 Administratively Complete: February 6, 1997
 Date of Draft Permit: June 9, 2000
 Permit No: 2521-121-0558-V-01-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Geiger Brickel - Atlanta Facility and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Geiger Brickel - Atlanta Facility

2. Parent/Holding Company Name

Geiger International, Inc.

3. Previous and/or Other Name(s)

None

4. Facility Location

7005 Fulton Industrial Boulevard
Atlanta, Georgia 30336
Fulton County

5. Attainment or Non-attainment Area Location

The facility is located in the Atlanta area ozone non-attainment area (Fulton County).

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area.

B. Site Determination

Geiger International, Inc. operates a furniture assembly to order (ATO) manufacturing facility located at 6300 Boat Rock Boulevard, Atlanta, Georgia. The facility is currently operating under Georgia Air Quality Permit No. 2521-121-0788-S-01-0. The ATO facility is more than 1.5 miles away from the facility located at 7005 Industrial Boulevard. Per the Division's letter, dated January 28, 1998, GAEPD has determined that the two facilities are separate sites with respect to Title V permitting.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2521-060-11457	November 15, 1994	x	
Amendment to 2521-060-11457	August 29, 1995		
Amendment to 2521-060-11457	October 25, 1995		

Table 2: Comments on Specific Permits

Permit Number	Comments
2521-060-11457	Permit issued for RACT

D. Process Description

1. SIC Code: 2521
2. Description of Products

Wood office furniture including desks, bookcases, and tables.

3. Overall Facility Process Description

The facility receives several shapes and sizes of particle board, veneers, and natural wood. The facility first cuts, trims, and covers the wooden pieces (particle board) with veneer. The pieces are sanded and assembled as necessary. The facility utilizes two separate process lines: one for stained products and one line for natural products. For stained products, case good components are stained via hand application techniques (stains emit toluene, xylene, and other VOC). Excess stain is wiped away with rags and sent to the stain/shade sealer booth to add additional color to the case goods. Sealers are the last material applied to the products. The stained parts then go to final assembly. For the natural wood line, the products only receive a light urethane coating instead of staining and then go directly to the topcoat booth. After the topcoat booth, vertical surfaces enter a topcoat tunnel where a water based urethane clear coat is applied. The vertical parts then dry for 20 minutes and are then sanded. The parts then go through the topcoat tunnel again and are then transferred to final assembly. Any components are coated in the stain/shade booth and are then cured for 45 minutes at 150 EF. The edge coater (utilizes coatings that are less than 0.1% VOC) and line coater coat the component parts which are then cured by UV lamps. The components then go onto final assembly. After leaving the shade/sealer booth, the horizontal parts stand for 24 hours, are sanded and touched up, and sent to the topcoat booth. The horizontal parts will then stand for hours before being transferred to the final assembly area. The major emissions for all of the above operations are VOC and HAP (primarily xylene and toluene).

4. Overall Process Flow Diagram (optional)

Diagrams are provided in Part 70 Operating Permit Application No. TV-9314.

5. Facility Wide Emissions Summary

The emissions summary listed in Table 3 is derived from the SSCP inspection report (August 5, 1998). The twelve month rolling total VOC emissions were reported. HAP and particulate emissions were derived from the facility's Title V permit application (No. TV-9314).

Table 3: Emissions Summary for Geiger Brickel - Atlanta Facility

Pollutant	Uncontrolled Potential Emissions (tpy)	Potential Emissions with Limits (tpy)	Actual Emissions (tpy)
VOC	> 250	100	63.8
Combined HAP	> 100	100	15
Toluene	> 25	> 25	10
Xylene	> 25	> 25	5
Particulate	> 100	< 5	< 2

E. Regulatory Status

1. PSD/NSR

The facility is a major source of VOC under NSR regulations. The facility has potential VOC emissions exceeding 50 tpy in the Atlanta ozone non-attainment area (Fulton County). Condition No. 3 of the current SIP permit (No. 2521-060-11457) limits VOC emissions from the entire facility to less than 100 tons per any twelve consecutive month period (to avoid LAER if the facility goes through NSR). The facility has not made any significant modifications in the past five years. In 1998, the edge coater and flat line coater (Emission Unit ID Nos. ISN04 and ISN05) were installed. The combined potential VOC emissions from both of these units is 0.1 tpy. Therefore, only 0.1 tpy of VOC is counted towards the facility 25 tpy five year contemporaneous period VOC limitation.

The VOC potential emissions from this facility are 100 tpy (via permit limitation), however, most of the VOC emissions (except VOC emissions the adhesive operations) from this facility are subject to Georgia VOC Rule (hhh) "Wood Furniture Finishing and Cleaning Operations", therefore, the facility is not subject to Georgia Rule (tt) "VOC Emissions from Major Sources" since a more specific VOC rule is applicable for the facility's emissions. The emissions from the adhesive operations (and any other VOC emissions) have potential emissions of well below 25 tpy, therefore, these VOC emissions are not subject to Rule (tt). Condition Nos. 5, 6, 12, 13, 14, 15, 16, 17, 18, and 19 were required under Rule (tt) and are no longer applicable, therefore, these conditions will not be included in the Title V permit. Conditions for Rule (hhh) will be incorporated into the Title V permit. The facility has potential NO_x emissions of below 50 tpy, therefore, the Geiger is not subject to Georgia Rule (yy) "Emissions of Nitrogen Oxides from Major Sources."

2. Title V Major Source Status by Pollutant

Table 4: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			T
PM ₁₀	Yes			T
SO ₂	Yes			T
VOC	Yes	T		
NO _x	Yes			T
CO	Yes			T
TRS	n/a			
H ₂ S	n/a			
Individual HAP	Yes	T		
Total HAPs	Yes	T		

3. MACT Standards

The facility has combined HAP emissions of greater than 25 tpy and individual HAP emissions greater than 10 tpy, therefore the facility is subject to 40 CFR Part 63 - Subpart JJ "National Emission Standards for Wood Furniture Manufacturing Operations."

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	No
Program Code 8 - Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M - Part 63 NESHAP	Yes
Program Code V - Title V	Yes

Regulatory Analysis

The following permit conditions discussed below will be federally enforceable by both the Georgia Environmental Protection Division and the US Environmental Protection Agency.

II. Facility Wide Requirements

A. Emission and Operating Caps:

1. Geiger Brickel has a facility wide VOC limitation of less than 100 tons during any consecutive twelve month period via Condition No. 3 of Georgia Air Quality Permit Application No. 2521-060-11457, issued November 15, 1994. This VOC limitation was placed upon the facility in order for the facility to avoid LAER in the event that the facility had to undergo NSR for a modification. Per Georgia Rules Chapter 391-3-1-.03(8)(c)(13)iii, any facility that emits less than 100 tpy of VOC can substitute best available control technology (BACT) for LAER. However, the facility can emit 50 tpy of VOC or greater, therefore, the facility is a major source with respect to NSR. Facility wide VOC emissions are estimated to be 63.8 tpy based upon facility records per SSCP inspection report dated August 5, 1998. The 100 tpy facility wide VOC limitation will be included in condition No. 2.1.1 of the Title V operating permit. According to the review of the facility's Title V Application No. TV-9314, the facility should be in compliance with this VOC limitation. Condition Nos. 6.2.1, 6.2.2, and 6.2.3 ensure that this VOC permit limitation is being met.

B. Applicable Rules and Regulations

None Applicable

C. Compliance Status

Per the SSCP inspection report, dated August 5, 1998, the facility was found to be in compliance. Section 11.00 of the Title V application does not indicate any compliance issues with this facility.

D. Operational Flexibility

The facility has not indicated any operational flexibility in Title V application No. TV-9314.

E. Permit Conditions

Conditions for the Title V permit Part 2.0 include the following:

Condition No. 2.1.1 limits the facility wide VOC emissions to less than 100 tons during any twelve consecutive month period.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility receives several shapes and sizes of particle board, veneers, and natural wood. The facility first cuts, trims, and covers the wooden pieces (particle board) with veneer. The pieces are sanded and assembled (glued) as necessary. The adhesive (includes ISN01, Bench Prep Area) operations (Emission Unit ID No. AD01) are regulated under the NESHAP Subpart JJ and will emit only slight amounts of VOC and HAP. Three dust

collection systems (Air Pollution Control Device ID Nos. APC8, APC9, and APC10) control particulate emissions from the wood working operations (panel saws, end tenoners, sanding, drilling, routers, shapers, and edge banders) - Emission Unit ID No. WW01. For each of these systems, dust and particulate matter is collected under vacuum and collected into the baghouse. All the baghouse media is provided by CS&S Filtration. The baghouse for APC8 consist of 114 bags, each 184 inches by 9 inches. The baghouse for APC9 consist of 100 bags, each 147 inches by 9 inches. The baghouse for APC10 consist of 100 bags, each 127 inches by 9 inches.

The facility utilizes two separate process lines: one for stained products and one line for natural products. For stained products, case good components are stained via hand application techniques in the stain room (Emission Unit ID No. F001). The stains emit toluene, xylene, and other VOC (7 tpy actual VOC emissions and 14.5 tpy potential VOC emissions). Excess stain is wiped away with rags and sent to the stain/shade sealer booths (Emission Unit ID Nos. PS01 and PS02) to add additional color to the case goods. Sealers are the last material applied to the products. Stains are applied with a Devilbiss JGV-560 cup gun and sealers are applied with a Devilbiss GHV-560-HVLP spray gun. Stains are thinned with acetone if necessary. Any horizontal stained components need a solvent based urethane sealant. The stained parts then go to final assembly.

For the natural wood line, the products only receive a light urethane coating instead of staining and then go directly to the topcoat booth (Emission Unit ID No. PS06) for a solvent based urethane sealant. After the topcoat booth, vertical surfaces enter a topcoat tunnel (Emission Unit ID No. PS04) where a water based urethane clear coat is applied. The vertical parts then dry (flashed) for 20 minutes, enter the gas fired oven for 25 minutes, and are then sanded. The oven (Emission Unit ID PS05) operates at about 145 EF. The parts then go through the topcoat tunnel again and are then transferred to final assembly. Any components are coated in the stain/shade booth and are then cured for 45 minutes at 150 EF in the UV curing oven (Emission Unit ID No. PS08). The edge coater (utilizes coatings that are less than 0.1% VOC) and line coater coat (Emission Unit ID Nos. ISN04 and ISN05) the component parts which are then cured by UV lamps. The components then go onto final assembly.

After leaving the shade/sealer booth, the horizontal parts (natural wood) stand for 24 hours in the drying room (Emission Unit ID No. PS07), are sanded and touched up, and sent to the topcoat booth (Emission Unit ID No. PS06). The horizontal parts will then stand for hours before being transferred to the final assembly area. Some case goods require the Tinta process in which the parts are sprayed with primer in the water based primer booth (Emission Unit ID No. PS03) and then enter the water based top coat tunnel (Emission Unit ID No. PS04) where the parts are coated with a catalyzed urethane enamel. The parts are then flashed in the tunnel for 20 minutes and then enter the gas fired oven (Emission Unit ID No. PS05) for 45 minutes, at 156 EF. The components leave the oven, stand for 2 hours and are routed to final assembly and inspection.

The major emissions for all of the above operations are VOC and HAP (primarily xylene and toluene). The particulate emissions from the spray booths are very minor. The major booths (Emission Unit ID Nos. PS01, PS02, PS03, PS04, and PS06) are controlled by fabric filters. The filters control at least 95% of the particulate matter from the over spray. The filters are five ply corrugated paper, 3200 series (NFPA Std.83), and one ply polyester. Booths PS01 and PS02 have three wall filters, seven feet by forty-five feet, each. PS03 has four wall filters, seven feet by forty-five feet, each. PS04 and PS06 have nine wall filters, nine feet by three feet, each. All of the filters visually inspected daily and replaced daily.

B. Equipment List for the Process

Table 5: Equipment List for Geiger Brickel

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
PS01	Shade/Stain Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.15	APC1	Spray Booth Filters
PS02	Shade/Stain Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.15	APC2	Spray Booth Filters
PS03	Water Primer Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.15	APC3	Spray Booth Filters
PS04	Water-based Topcoat Tunnel	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.15	APC4	Spray Booth Filters
PS06	Topcoat Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.15	APC6	Spray Booth Filters

Table 5: Equipment List for Geiger Brickel

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
F001	Hand Stain/Wipe Operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.9, 3.3.11, 3.4.1, 3.4.3, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, and 6.2.15	None	None
MC01	Miscellaneous Coating Operations Group: ISN04, ISN05, ISN06, and ISN07	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(hhh) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, and 6.2.15	None	None
AD01	Adhesive Operations	391-3-1-.02(2)(b) 40 CFR 63 - Subpart JJ	2.1.1, 3.3.1, 3.3.2, 3.3.7, 3.3.8, 3.3.11, 3.4.1, 6.2.1, 6.2.2, 6.2.3, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10, and 6.2.15	None	None
WW01	Woodworking Operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.3, 5.2.1, 6.2.14, and 6.2.15	APC8, APC9, and APC10	Dust Collection Systems

C. Equipment & Rule Applicability

! Emission and Operating Caps:

None

! Applicable Rules and Regulations -

Rules and Regulations Assessment:

The facility is subject to the following Georgia State Rules:

- 391-3-1-.02(2)(b) Visible Emissions
- 391-3-1-.02(2)(e) Particulate Emissions from Manufacturing Processes
- 391-3-1-.02(2)(hhh) Wood Furniture Finishing and Cleaning Operations
- 391-3-1-.02(3) Sampling

The facility is subject to the following Federal Standard:

- 40 CFR Part 63 - Subpart JJ National Emission Standards for Wood Furniture Manufacturing Operations

All of the process emission units listed in Table 4 are subject to Georgia Rule 391-3-1-.02(2)(b) because it applies to all sources that are subject to at least one other emission limitation and not subject to any other, more stringent, opacity standard.

All of the process booths and wood shop operations (Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, MC01, and WW01) are subject to Georgia Rule 391-3-1-.02(2)(e) because these emission units are considered new equipment, constructed after July 2, 1968. Therefore, particulate matter emissions allowable is based on the following equation:

$E = 4.1 * (P)^{0.67}$ where E equals the allowable particulate emissions rate in lb/hr and P equals the process input weight rate in tons/hr. This equation applies only to process input rates up to and including 30 tons/hr.

The facility's spray booths and staining operations (Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, F001, and MC01) are subject to Georgia Rule 391-3-1-.02(2)(hhh) because the VOC emissions from these operations exceed 25 tpy and the facility is in the Atlanta area (Fulton County) ozone non-attainment area (100 tpy threshold only applies to the contributing area to the ozone non-attainment area).

The facility's spray booths, adhesive operations, and staining operations (Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, F001, AD01, and MC01) are subject to 40 CFR Part 63 Subpart JJ because the actual combined HAP emissions are greater than 25 tpy and the individual HAP emissions for several HAPs are greater than 10 tpy. The facility is considered an existing source since it was in operation before December 7, 1995. The compliance date for this facility was December 7, 1998 because the facility emitted less than 50 tpy HAP in 1996.

Emission and Operating Standards:

- | | |
|---------------------|---|
| 391-3-1-.02(2)(b) | Visible Emissions: Limits opacity of an air contaminant source to less than 40 %. |
| 391-3-1-.02(2)(e) | Particulate Emissions from Manufacturing Processes: Limits emissions of particulate matter from the process booths and the wood shop operations (Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, MC01, and WW01) to 4.1 pounds per hour based on the formula $E = 4.1(P)^{0.67}$, E = emission rate in pounds per hour, P= process input weight rate in tons per hour = 1.0 tph. Potential PM emissions are less than 1.5 pounds per hour after the control from the dust collection systems (Air Pollution Control Device ID Nos. APC8, APC9, and APC10). |
| 391-3-1-.02(2)(hhh) | Wood Furniture Finishing and Cleaning Operations: Limits the finishing operations coatings by limiting topcoats to no more than 0.8 pounds VOC per pound of solids, as applied, or limiting sealers to no more than 1.9 pounds of VOC per pound of solids, as applied, and topcoats to no more than 1.8 pounds of VOC per pound of solids, as applied. The facility can comply with the above standard by ensuring that each and every applicable coating meets the above standard, or ensure that the daily weighted average of the applicable coating in the finishing operations meet the above standard, or ensure that a control system is utilized that |

will achieve an equivalent reduction in emissions and meet the above emission standards on a continuous basis, or using a combination of the above methods. The facility will either ensure that every coating meets the specified VOC standards or ensure that the daily weighted average of the applicable coating applied in the finishing operations meet the above specified VOC standards.

Rule (hhh) also requires that the facility only use strippable booth coating materials that contain no more than 0.8 pounds of VOC per pound of solids. The above standard is identical to the standard for strippable booth coating in the NESHAP Subpart JJ. The facility is also required to prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture operation. The work practice plan is already covered by the work practice implementation plan required by NESHAP Subpart JJ. The facility is required to keep certified product data sheets (CPDS) for each sealer, topcoat, strippable booth coating, and any other dilution material used in the finishing operations. The requirements of the CPDS are included in the conditions pertaining to NESHAP Subpart JJ.

40 CFR Part 63 - Subpart JJ

Subpart JJ limits the finishing operation coatings (including topcoats, stains, sealers, washcoats, basecoats, and enamels) to 1.0 lb of VHAP/lb solid (63.802(b)(1)). Thinners are limited to a 10% VHAP content, by weight (63.802(b)(1)). Any thinners used to formulate finishing material onsite are limited to a 3% VHAP content, by weight (63.802(b)(1)). The facility can comply with the above emission limitations by using all Subpart JJ compliant coatings (Limits specified above) or achieve the monthly weighted average VHAP content of all the finishing material (including topcoats, stains, sealers, washcoats, basecoats, enamels, and thinners) of 1.0 pounds of VHAP per pound of coating solids applied (delivered to the coating applicator). Contact adhesives are limited to 1.8 lb VHAP/lb solid (63.802(b)(2)) for those meeting flammability requirements. Contact adhesives are limited to 1.0 lb VHAP/lb solid (63.802(b)(2)) for those not meeting flammability requirements. Strippable spray booth materials are limited to 0.8 lb VOC/lb solid (63.802(b)(3)).

The compliance reports from the facility to the Division (January 18, 2000) demonstrate that the total VHAP to solids ratio has never exceeded 0.21 pounds of VHAPs per pound of solids as applied for the calendar year 1999. All of the finishing materials used in the past year are compliant materials. The strippable booth coating has a VOC content below of 0.8 pounds VOC per pound of solids applied. The contact adhesive used by the facility is compliant with NESHAP Subpart JJ per the facility's letter.

Subpart JJ requires that the facility also maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses each of the topics specified as follows: Operator training course, inspection and maintenance plan, cleaning and washoff solvent accounting system, chemical composition of cleaning and washoff solvents,

spray booth cleaning, storage requirements, application equipment requirements, line cleaning, gun cleaning, washoff operations, and formulation assessment plan for finishing operations. The facility stated that they are in compliance with 40 CFR 63.803 by complying with the work practice standards and following the work practice standards (January 18, 2000, letter to the Division).

The facility will be required to submit records and applicable files verifying that they are meeting all applicable emission limitations and following all work practices standards (including maintaining a written plan) required by NESHAP Subpart JJ and Georgia VOC Rule (hhh).

D. Compliance Status

The facility did not indicate any compliance issues in the section 11.10 of their Title V Application No. TV-9314. Division files do not indicate any current compliance issues.

E. Operational Flexibility

The facility has not requested any operational flexibility.

F. Permit Conditions

1. Condition No. 3.3.1 is a general condition that subjects the facility to 40 CFR Part 63 - Subpart JJ.
2. Condition No. 3.3.2 defines a volatile hazardous air pollutant (VHAP) as any air pollutant listed in Table 2 of 40 CFR Part 63 Subpart JJ and also defines the term "as applied."
3. Condition No. 3.3.3 limits the VHAP content of the finishing material (including stains, washcoats, sealers, topcoats, basecoats, and enamels) used at Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, F001, and MC01) to no more than 1.0 pound VHAP per pound of solids, as applied (used).
4. Condition No. 3.3.4 limits the VHAP content of any thinner purchased premade to no greater than 10%, by weight. Any thinner used for onsite formulation of finishing material (only washcoats, basecoats, and enamels) shall not have a VHAP content of greater than 3%, by weight.
5. Condition No. 3.3.5 specifies that the facility can comply with the emission limitations in Condition Nos. 3.3.3 and/or 3.3.4 by either having each and every coating material (including stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners) used at the facility meet the specified VHAP limitation and/or determining the monthly weighted average of all of the coating material (including stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners) used at the facility and ensuring that it meets the VHAP solids limit of 1.0 pound VHAP per pound of solids applied (used).
6. Condition No. 3.3.6 prohibits the use of any strippable booth coating used at Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, and MC01 that has a VHAP content of greater than 0.8 pounds of VOC per pound of solids applied.

7. Condition No. 3.3.7 prohibits the use of any foam adhesive, meeting flammability requirements, that has a VHAP content of greater than 1.8 pounds of VHAP per pound of solids applied. This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.
8. Condition No. 3.3.8 prohibits the use of any contact adhesive, not meeting flammability requirements, that has a VHAP content of greater than 1.0 pound of VHAP per pound of solids applied. This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.
9. Condition No. 3.3.9 prohibits the facility from using cleaning and washoff solvent that contain any of the pollutants listed in Table 4 of 40 CFR Part 63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
10. Condition No. 3.3.10 prohibits the facility from using compounds containing more than 8.0 % VOC, by weight, for the cleaning of spray booth components other than conveyors, continuous coaters, or strippable booth coating (unless the spray booth is being refurbished). If the spray booth is being refurbished then no more than one gallon of organic solvent should be used in the surface preparation of the booth prior to applying the booth coating.
11. Condition No. 3.3.11 requires that the facility follow all of the work practice standards outlined in the work practice implementation plan specified in 3.3.11(a) through 3.3.11(j) and follow such plan for each operation subject to 40 CFR Part 63 Subpart JJ.

Condition No. 3.3.11(a) requires that the facility develop an operator training course for all personnel in affected operations. The training course at a minimum should consist of a list of current personnel by name and job description that are required to be trained, an outline of the subjects to be covered in the initial and refresher training for each position, the lesson plans for the course to be given at the initial and refresher courses which should emphasize appropriate application techniques and equipment management, and a description of the methods used at the completion of the training to demonstrate and document successful training.

Condition No. 3.3.11(b) requires that the facility develop an inspection and maintenance plan for leak inspection that specifies the following: a minimum visual inspection frequency of once per month for all affected equipment, an inspection schedule, methods for documenting the date and results of the inspections and any repairs that were made, and the time frame between identifying the leak and making the repair. The repair schedule for repairing leaks will adhere to the following schedule: the first attempt to repair should be made with five days of the detection of the leak and final repairs should be made with 15 days after the leak is first detected or three months if the new equipment is to be replaced by a new purchase.

Condition No. 3.3.11(c) requires that the facility develop and maintain a chemical composition accounting system to record from each affected source the following: the type and quantity of each organic solvent used each month for washoff and cleaning, the number of pieces washed off and reason for washoff, and the quantity of spent solvent generated from each washoff and cleaning operation each month.

Condition No. 3.3.11(d) requires the facility to note that the work practice plan specifies that the facility should not use any solvents and/or cleaners that are disallowed per Condition No. 3.3.9.

Condition No. 3.3.11(e) requires the facility to note that the work practice plan specifies that the facility should not use any solvents and/or cleaners that are disallowed per Condition No. 3.3.10 based upon VOC content and/or amount.

Condition No. 3.3.11(f) requires that the facility close containers for storing finishing, gluing, cleaning, and washoff materials.

Condition No. 3.3.11(g) specifies that the facility can only use conventional air spray guns to apply finishing material under the following circumstances: to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, for touch up and repair operations after the finishing operations, when spray is automated, when emissions from the finishing operations are directed to a control device, when the total usage of finishing material applied with the conventional air gun is no more than five percent of the total gallons of finishing material used during that semiannual period, or the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application device.

Condition No. 3.3.11(h) requires that the facility pump or drain all organic solvent used to clean spray guns and/or used in paint line cleaning into a normally closed container.

Condition No. 3.3.11(i) requires that the facility control emissions from washoff operations by using normally closed tanks for washoff and minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

Condition No. 3.3.11(j) requires the facility to develop and maintain a formulation assessment plan that includes the following: identify the VHAP from the list presented in 40 CFR 63, Subpart JJ, Table 5, that are being used in the finishing operations, establish a baseline level of usage for each VHAP identified above in accordance with 40 CFR 63.803(1)(2) and (6), track the annual usage of each VHAP identified above that is present in amounts subject to MSDS reporting by OSHA, and notification of the Permitting Authority, per Condition No. 6.2.8, if the annual usage of any VHAP identified above exceeds its baseline level, as outlined in 40 CFR 63.803(1)(4 through 6).

12. Condition No. 3.4.1 subjects Emission Units in Table 5 to Rule (b). This limits opacity from Emission Units to no greater than forty percent.
13. Condition No. 3.4.2 subjects Emission Unit ID Nos. PS01, PS02, PS03, PS04, PS06, MC01, and WW01 to Rule (e). This limits particulate matter emissions derived from $E = 4.1(P)^{0.67}$.
14. Condition No. 3.4.3 limits VOC emissions from finishing operations by limiting topcoats to no more than 0.8 pounds VOC per pound of solids, as applied, or limiting sealers to no more than 1.9 pounds of VOC per pound of solids, as applied, and topcoats to no more than 1.8 pounds of VOC per pound of solids, as applied. This limit is required by Rule (hhh).

15. Condition No. 3.4.4 specifies that the facility can comply with the emission limitation in Condition 3.4.3 by either having each topcoat and/or sealer used meet the specified VOC limitation or determining the daily weighted average of all topcoats and sealers used in the finishing operations and ensuring that they meet the VOC limitations specified by Condition No. 3.4.3.
16. The strippable booth coating is already limited to 0.8 pounds of VOC per pound solid, applied, by NESHAP Subpart JJ, therefore, no additional condition pertaining to strippable booth coating is needed for Rule (hhh).
17. The facility is already required to develop and maintain a written work practice implementation plan by NESHAP Subpart JJ, therefore, no additional conditions are needed pertaining to the work practice plan for Rule (hhh).
18. Condition No. 3.5.1 will require the facility to control the particulate matter emissions from the finishing spray booths (Emission Unit ID Nos. PS01, PS02, PS03, PS04, and PS06) by the specified fabric filters (Air Pollution Control Device ID Nos. APC1, APC2, APC3, APC4, and APC6). The facility will also be required to control the particulate matter emissions from the wood working operations by the three dust collection systems (Air Pollution Control Device ID Nos. APC8, APC9, and APC10).
19. Condition No. 3.5.2 requires the facility to change the spray booth filters for each of the spray booth at least once per day for Emission Unit ID Nos. PS01, PS02, PS03, PS04, and PS06. This condition will ensure that particulate emissions are adequately controlled.
20. Condition No. 3.5.3 requires the facility to perform an inspection of the dust collection systems (Air Pollution Control Device ID Nos. APC8, APC9, and APC10) at least once per week of operation for any malfunction or improper operation. The facility should check for any holes, tears, or damage to the system to ensure proper working order. This condition will ensure that particulate emissions are adequately controlled.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

None of the applicable regulations requires performance testing; therefore, this permit does not contain any conditions to require specific testing for any sources. The permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

None Applicable

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

1. Condition No. 5.2.1 requires the facility to perform a visible emissions check for each dust collection system once per day of operation and maintain and suitable and proper log of each visible emissions check. Any visible emissions should be noted. This condition will ensure that particulate emissions are adequately controlled. Work practice procedures required by Condition Nos. 3.5.1, 3.5.2, and 3.5.3, ensure that particulate matter emissions are sufficiently controlled, therefore, additional monitoring is not required for the spray booths to demonstrate compliance with Rule (e). Additional monitoring is not required to demonstrate compliance with Rule (b) because the opacity from all of the emission units at the facility are minimal and there is not a likelihood of a violation of Rule (b).

VI. Other Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

Requirements for the maintenance of all records for a period of five years and for the prompt reporting of excessive emissions from process malfunctions or improper maintenance are included (Condition Nos. 6.1.1, 6.1.2, and 6.1.3).

The Permittee is required in Condition 6.1.4 to submit a semiannual report. This report should contain information on deviations (described in exceedences) which occurred during the reporting period. The required information is enumerated in the Condition. Condition 6.1.5 requires any analysis or sampling records to be kept. All records should be maintained for at least five years according to Condition 6.1.6.

Condition No. 6.1.7 details deviations which are to be included in the semiannual report required in Condition No. 6.1.4. Excess emissions occur if the facility exceeds any of the emission limits specified in Condition Nos. 3.3.3, 3.3.4, 3.3.6, 3.3.7, and 3.3.8. Exceedences would occur if the facility exceeded any of the VOC limits specified in Condition Nos. 2.1.1 and 3.4.3. An excursion would occur if any work practice standard detailed in the work practice implementation plan required by Condition No. 3.3.11 is not followed, any adverse condition is revealed by the inspection required by Condition No. 3.5.3, any failure to perform the filter changes required by Condition No. 3.5.2, any failure to perform the visual emissions check required by Condition No. 5.2.1, and any visual emissions are detected by the aforementioned check required by Condition No. 5.2.1.

B. Specific Record Keeping and Reporting Requirements

Condition No. 6.2.1 requires the facility to maintain monthly usage records of all VOC and VHAP containing compounds utilized at the facility. Condition No. 6.2.2 requires the facility to calculate the monthly VOC emissions per Division Guidelines and notify the Division if the VOC emissions for any month exceed 8.33 tons. Condition No. 6.2.3 requires the facility to calculate the twelve month rolling total VOC emissions for each month and notify the Division when the VOC emissions equal or exceed 100 tons during any consecutive twelve month period. Notification must be submitted within 15 days. Condition Nos. 8 and 9 of the current SIP permit will be replaced by the above conditions.

Condition No. 6.2.4 requires that the facility use the monthly records required by Condition No. 6.2.1 to calculate the monthly weighted average VHAP content across all coatings and notify the Division when the weighted average VHAP content (E) exceeds 1.0 pound VHAP per pound of solids applied during any calendar month. Notification must be submitted within 15 days.

Condition No. 6.2.5 requires that the facility maintain certified product data sheets for each finishing material, thinner, contact adhesive, and strippable booth coating containing VHAP and/or VOC used. If solvent or other VHAP or VOC is added to finishing material before application, the facility will maintain documentation showing the VHAP and VOC content of the material delivered to the coating applicator. The facility will notify the Division if any finishing material and/or thinner exceeds the limits specified in Condition Nos. 3.3.3 and 3.3.4. Notification must be submitted within 15 days. This condition satisfies the requirements of both NESHAP Subpart JJ and VOC Rule (hhh).

Condition No. 6.2.6 requires the facility to notify the Division if any strippable booth coating used exceeds the limit specified in Condition No. 3.3.6. Notification must be submitted within 15 days.

Condition No. 6.2.7 requires the facility to notify the Division if any contact and/or foam adhesive used exceeds the limits specified in Condition Nos. 3.3.7 and/or 3.3.8. Notification must be submitted within 15 days.

Condition No. 6.2.8 requires the facility to notify the Division if the annual usage of VHAP identified in accordance with Condition No. 3.3.11(j)(ii) exceeds its baseline level and explain the reason for increased usage. Notification must be submitted within 30 days.

Condition No. 6.2.9 requires the facility to submit the semiannual compliance report as required by Condition No. 6.1.4, information required by 40 CFR 63.804(g), a statement of compliance or noncompliance, and the action taken to correct noncompliance problems. This report will include a statement regarding the compliance status of the sealer, topcoat, and strippable booth coatings, and a status of the work practice implementation plan. The compliance status report must be signed by a responsible official.

Condition No. 6.2.10 requires the facility to keep proper documentation demonstrating that the facility is in compliance with all parts of the work practice implementation plan specified by Condition No. 3.3.11. Condition No. 6.2.11 requires the facility to use the records required by Condition No. 6.2.5 to calculate the VOC content of all topcoats and sealers used in the finishing operations and notify the Division if the VOC content of any topcoat and/or sealer exceeds the limits specified in Condition No. 3.4.3 if the facility will not demonstrate compliance with Condition No. 3.4.3 via Condition No. 3.4.4(b). Notification must be submitted within 15 days.

If complying with Condition No. 3.4.3 by Condition No. 3.4.4(b), Condition No. 6.2.12 will require the facility to keep daily usage records of all VOC material utilized at the finishing operations at the facility. The facility must calculate the daily weighted average VOC content across all topcoats and sealers used in the finishing operations and notify the Division when the daily weighted average VOC content of topcoats and/or sealers exceed the limits specified in Condition No. 3.4.3. Notification must be submitted within 15 days.

Condition No. 6.2.13 will require the facility to maintain a log indicating the time and date that the spray booth filters are replaced as required by Condition No. 3.5.2.

Condition No. 6.2.14 requires the facility to maintain a log indicating the time and date that the dust collection systems were inspected for malfunctions as required by Condition No. 3.5.3. Any malfunctions should be indicated in the log with the appropriate date and time of the incident.

Within 90 days after the issuance of the permit, Condition No. 6.2.15 requires the facility to submit records, calculations, and logs, as required by Condition Nos. 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.10, 6.2.11, 6.2.12, 6.2.13, and 6.2.14 for review and approval by the Division.

VII. Specific Requirements

A. Operational Flexibility

Operational flexibility was not requested by the facility.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

The only insignificant activities listed are brazing, soldering, and welding activities in section 4.10. The flammable storage area (Emission unit ID No. ISN02), the gas fired oven (Emission Unit ID No. PS05), the drying room (Emission Unit ID No. PS07), and the drying UV oven (Emission Unit ID No. PS08) will be included under the insignificant activities table based on emission levels. The 20 gallon parts washer (Emission Unit ID No. ISN03) uses only 60 gallon per year of material and will be listed in the insignificant activities list.

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The facility is in compliance per SSCP inspection report dated August 5, 1998.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

This source is not subject to the Acid Rain requirements of Title IV.

I. Prevention of Accidental Releases

The facility did not indicate applicability in §12.10 of the Title V permit application.

J. Stratospheric Ozone Protection Requirements

The facility has indicated that they are subject to Title VI. However, the facility does not have a piece of refrigeration equipment with a refrigerant charge greater than 50 pounds.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

//Place addendum text starting here//

Draft Permit Review		
Reviewing Program	Comments Received? (y/n)	Comments Taken Into Consideration In Draft Permit? (y/n)
ISMP		
SSCP		

SSPP Unit Manager:

_____ Date

Robert T. Johnson

SSPP Program Manager:

_____ Date

SSPP Program Manager